

COHEN & GREEN

September 2, 2020

Hon. Victor Marrero
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Suite 1610
New York, NY 10007

USDC SDNY
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**Re: Page Limit Request in
Jones et al. v. United States Postal Service et al., 20-cv-6516-VM**

Dear Judge Marrero:

My firm, along with other counsel who have appeared, represents the Plaintiffs in the case named above. I write under the Court's Individual Practice II(D) to request the Court allow us 30 pages (an additional 5 pages beyond the default limit) in our memorandum requesting a preliminary injunction. Defendants have graciously consented to this request provided they are similarly allowed 30 pages to respond.

The Court's standard on this matter is that such enlargements should only be granted "in rare cases where the facts and issues are particularly complex." We believe this is such a rare case. It concerns national USPS policies, involves complex and often contradictory documents and testimony, involves important and thorny questions of law, and is on an accelerated timetable that does not allow for the same kind of planning and efficiency that would take place in the ordinary course.

Related to that last point, I fully intend to try to keep our memorandum to 25 pages – and may manage to do so – but am making this request in an abundance of caution. We all thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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cc:

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